

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
The Honorable Ben N. Miller, III, Special Referee

Appellate Case No. 2024-001062  
Case No. 2017-CP-40-01687

Deutsche Bank National Trust Company, as Trustee for Home  
Equity Mortgage Loan Asset-Backed Trust, Series SPMD 2002-B,  
Home Equity Mortgage Loan Asset-Backed Certificates, Series  
SPMD 2002-B under the Pooling and Servicing agreement dated  
Sept 1, 2002 .....Respondent,

v.

Janet L. Nelums a/k/a Janet Nelims, Christopher Nelums, Imperial  
Warehouse Finance, Inc., and Best Distributing Company, ..... Defendants,

of which

Janet L. Nelums and Christopher Nelums are the..... Appellants.

**Respondent’s First Motion for Extension of Time to File Return to  
Appellants’ Motion for Leave to Seek Sanctions**

Respondent Deutsche Bank National Trust Company, as Trustee for Home Equity  
Mortgage Loan Asset-Backed Trust, Series SPMD 2002-B, Home Equity Mortgage Loan Asset-  
Backed Certificates, Series SPMD 2002-B under the Pooling and Servicing agreement dated Sept.  
1, 2002 (“DBNTC”) moves the Court under Rules 240, SCACR for an extension of time to file its  
Return to Appellants’ Motion for Leave to Seek Sanctions (the “Motion”).

As indicated in DBNTC’s December 4, 2024 Letter to the Court seeking clarification of  
deadlines, several of Appellants’ previous filings have not been served on DBNTC, so DBNTC

has tried to keep abreast of the case filings via the Court’s email correspondence and review of the docket. After pointing out this procedural deficiency, the Motion filed December 18, 2024, was received at the office of counsel for DBNTC on the afternoon of December 23, 2024—hours before the Court closed for Christmas. Notwithstanding the late service of the Motion, the current deadline to file the return to the Motion would be today, Monday, December 30, 2024.

DBNTC respectfully requests a ten-day extension of time to respond to Appellants’ Motion. Good cause exists to grant the extension because (1) this deadline falls between two State observed holidays and related vacation travel for DBNTC’s counsel; (2) the inconsistency of service of filings by Appellants in this case; (3) the Court-granted extension of time to respond to Appellant’s Initial Brief, which is now due from DBNTC on January 18, 2025. The requested extension will not prejudice any party, and is necessary given the reasons set forth above.

DBNTC, therefore, asks that the Court grant this Motion for Extension of Time, extending the deadline to file the return to the Motion Thursday, January 9, 2025. DBNTC also asks that its deadline to file its return to the Motion be held in abeyance pending the Court’s ruling on the present extension motion.

**[Signature on following page.]**

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Columbia, South Carolina  
December 30, 2024

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**Proof of Service**

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I, the undersigned of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys  
for Respondent Deutsche Bank National Trust Company, as Trustee for Home Equity Mortgage  
Loan Asset-Backed Trust, Series SPMD 2002-B, Home Equity Mortgage Loan Asset-Backed  
Certificates, Series SPMD 2002-B under the Pooling and Servicing agreement dated Sept 1, 2002,  
certify that I have served parties to this appeal with the documents referenced below on the date  
set forth below:

Document(s): **Respondent's First Motion for Extension of Time to File Return to Appellants' Motion for Leave to Seek Sanctions**

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*Attorneys for Respondent Deutsche Bank National Trust Company, as Trustee for Home Equity Mortgage Loan Asset-Backed Trust, Series SPMD 2002-B, Home Equity Mortgage Loan Asset-Backed Certificates, Series SPMD 2002-B under the Pooling and Servicing agreement dated Sept 1, 2002*

Columbia, South Carolina  
December 30, 2024